

Exhibit D

Jared Goodman

From: Victor Essen <vessen@rssclaw.com>
Sent: Monday, October 21, 2019 12:27 PM
To: Martina Bernstein
Cc: Debbie Champion; Jared Goodman
Subject: RE: MPF v. PETA/Deposition of Ms. Casey about new matters

I cannot agree to any more time than has already been ordered by the Court. If anything, I think that the recently filed Motion should actually narrow the live issues that need to be explored.

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From: Martina Bernstein [mailto:MartinaB@petaf.org]
Sent: Thursday, October 17, 2019 1:20 PM
To: Victor Essen
Cc: Debbie Champion; Jared Goodman
Subject: [EXTERNAL] RE: MPF v. PETA/Deposition of Ms. Casey about new matters

Victor:

In light of today's filing, please confirm that Ms. Casey will make herself available to testify about the matters she claimed in her affidavit, *in addition to* the previously ordered hours for which we have currently noticed Ms. Casey in her individual and representative capacities. I estimate that we will require approximately two additional hours next week to cross-examine her about these newly asserted defenses.

Martina Bernstein
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